

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TERRENCE ZEHRER,

Plaintiff,

v.

HARBOR CAPITAL ADVISORS, INC.,

Defendant.

Case No.: 14-cv-00789

Hon. Joan Humphrey Lefkow

RUTH TUMPOWSKY,

Plaintiff,

v.

HARBOR CAPITAL ADVISORS, INC.,

Defendant.

Case No.: 14-cv-07210

CONSOLIDATED

PLAINTIFFS' MOTION FOR EXTENSION OF DISCOVERY SCHEDULE

Plaintiffs Terrence Zehrer and Ruth Tumpowsky, by their undersigned counsel, hereby respectfully move the Court for an Order extending the discovery deadlines in the Scheduling Order in Consolidated Cases by three months to allow adequate time for the parties to complete fact discovery (the "Motion").

This Motion is and will be based upon the accompanying Memorandum of Law, the Declaration of Stephen J. Oddo, the Declaration of Edward B. Gerard, the Declaration of Robert Lakind, the Court's record in this action, and such other matters as may be presented to the Court.

CERTIFICATION PURSUANT TO FED. R. CIV. P. 37(A)(1) AND LOCAL RULE 37.2

Pursuant to Rule 37(a)(1) of the Federal Rules of Civil Procedure and Local Rule 37.2 of the Local Rules of the United States District Court for the Northern District of Illinois, counsel for plaintiffs Terrence Zehrer and Ruth Tumpowsky hereby certify that they have conferred with counsel for defendant Harbor Capital Advisors, Inc. in a good-faith effort to resolve by agreement the issues raised in this motion. Specifically, the parties conferred by conference call on August 10, 2015, regarding a possible offer of compromise, but the parties were unable to reach an agreement.

Dated: August 13, 2015

Respectfully submitted,

ROBBINS ARROYO LLP

/s/ Stephen J. Oddo

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: August 13, 2015

/s/ Stephen J. Oddo

STEPHEN J. ODDO